

18. december 2021

Kære udvalgsmedlemmer

Efter nu i mange måneder at have forsøgt at påvirke de danske MEPs til i det kommende energidirektiv at udvide den undtagelsesbestemmelse, der siden 2010 har været i energidirektivet for officielt registrerede historiske bygninger, er det en skuffelse i dag, at have modtaget denne nyhedsmail fra vores europæiske fællesrepræsentation, European Historic Houses.

Vi er klar over, at vi har indvilget i at overholde Parisaftalens klimamål og vil også gøre vort bedste til at bidrage hertil. Vi mener imidlertid, at det er vigtigt, at vi gør, hvad vi kan for at undgå at ødelægge både den danske og resten af europas kulturarv, når dette ikke er nødvendigt.

De godt 7000 danske fredede bygninger vil sandsynligvis ikke være truet. Af de estimerede 120.000 bevaringsværdige bygninger med høj udvendig bevaringsværdi, vil mindst halvdelen være i fare, fordi kun halvdelen er officielt registreret og omfattet af bevaringsbestemmelser i enten en kommuneplan eller lokalplan med bevaringsbestemmelser. Resten og det er mindst 60.000 bevaringsværdige bygninger er i alvorlig fare med indholdet i det kommende energidirektiv, fordi over halvdelen af danske kommuner endnu ikke har registreret og beskyttet deres bevaringsværdige bygninger. Det har de ikke, fordi de ikke har prioriteret dette stykke arbejde af den ene eller anden grund, og der vil nok gå en del år, før de har det. I mellemtiden vil de nye energikrav overflødiggøre dette arbejde, fordi bevaringsværdierne vil være pakket ind i isoleringsmateriale og forsvundet.

Vi mener, at det er særdeles vigtigt for Danmarks og Europas kulturarv, at direktivet udvides til, at alle historiske bygninger opført før 1960 ved ønske om udvendig isolering skal ansøge sin lokale kommune om tilladelse, således at kommunen pålægges at registrere og værdisætte bevaringsværdierne, før evt. tilladelse kan gives. I benægtende fald må isolering foretages indvendigt i bygningerne i det omfang, det kan lade sig gøre. Det er mere kompliceret, men kan med omtanke sagtens lade sig gøre. Vi har erfaring med det fra de fredede bygninger.

Jeg har løbende haft kontakt til Margrethe Auken, som i foråret stillede spørgsmål til kommissionen vedrørende problematikken. Svarene var nølende, fordi man ønskede at afvente udvalgsarbejdet vedrørende direktivet. Jeg har skrevet til Niels Fuglsang, som ikke har svaret. Kun Pernille Weiss har ønsket at tage sagen op og gøre hvad hun kan. Jeg håber udvalget vil bakke op omkring sagen, idet jeg har erfaring med, at den danske energistyrelse ikke har bevaring af Danmarks kulturarv som sin hovedprioritet.

Skulle udvalget ønske at stille mig opklarende spørgsmål, står jeg naturligvis til rådighed.

Med venlig hilsen
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Emne: Proposed Recast EPBD

Proposed Recast EPBD

ENERGY PERFORMANCE BUILDINGS DIRECTIVE (EPBD)

The European Commission has just published the draft directive of the **EPBD (Energy performance buildings directive)** which will now go through the European Parliament (where we will try to push for changes).

The draft is dangerous for us:

- The “exception rule” has been narrowed: Member states might just “amend” the rules and only for “officially protected” buildings.
- All buildings (outside the exceptions) will need to comply with Mandatory Energy performance standards (MEPS) through mandatory third-party Energy Performance Certificates (EPC). By 2033 no building having F or G classification will be able to be sold, rented, or even lived in. For non-

officially protected historic houses this will be a major issue and probably national or local laws and rules might be contradictory.

- Financial Incentives: Seems to be very complicated.

We will publish a paper with the official position of European Historic Houses in the next weeks, but already it is very important that you alert your members and put pressure on your national lawmakers. We have sent out a film (with a distribution kit) which should be spread as widely as possible to already give us a broad social media track record that we can then show to the European lawmakers.

[Click here to watch the video](#)

The EPBD, together with the relevant provisions of the [Energy Efficiency Directive \(EED\)](#) and the [Renewable Energy Directive \(RED\)](#), is the main piece of EU legislation impacting the building sector. First adopted in 2010 and revised in 2018, the EPBD aims to improve the energy performance of the European building stock by introducing measures and obligations for both new and existing buildings, to ensure buildings consume the least energy possible and do not pollute.

Such measures include:

- The development of national [Long-Term Renovation Strategies \(LTRSs\)](#) for the decarbonisation of the building stocks by 2050.
- Minimum performance requirements at cost-optimal levels for buildings undergoing a major renovation and meeting the Nearly-Zero Energy (NZEB) criteria for all new buildings as from 2021.

The EPBD also prescribes the issuance of Energy Performance Certificates (EPCs) every time a building is sold or rented. In its submission to the EPBD Roadmap, CAN Europe stressed that to be in line with the Paris Agreement's goal, the EU should reduce greenhouse gas emissions by at least 65% by 2030. This requires at least triple the current annual rate of building renovations, increasing significantly their depth and moving towards a fully renewables-based energy supply.

In the framework of the European Green Deal, the European Commission is currently reviewing the built environment directives to make them compliant with their greenhouse gas emission reduction targets.

Some of the key changes envisaged by the EPBD Recast are:

1. Phased introduction of mandatory **minimum energy performance standards (MEPS)** for existing buildings (*Art 9*). What is foreseen in the current draft is that F and G rated buildings will not be able to be used anymore from 2033 onwards (not only rented or sold, but also not lived in!). However, Member States may decide not to apply MEPS the requirements for “buildings officially protected as part of a designated environment or because of their special architectural or historical merit, in so far as compliance with certain minimum energy performance requirements would unacceptably alter their character or appearance.”
2. To ensure consistent monitoring and comparability of results, **Energy Performance Certificates (EPCs)** (*Art 16*) should be better **harmonised** and accessible. The information displayed should always include the share of energy from renewable sources, coupled with recommendations on the measures needed to achieve deep renovation (e.g. **Building Renovation Passports**; *Art 10*):

“The **building renovation passport** shall be issued by a qualified and accredited expert, following an on-site visit. It shall comprise a renovation roadmap indicating a sequence of renovation steps building upon each other, with the objective to transform the building into a zero-emission building by 2050 at the latest.”

3. **Issue of energy performance certificates (Art 17)**: Elimination of the possibility for member states to exclude from certification the same categories excluded under *Art 4* (now *Art 5*) [Member States shall take the necessary measures to ensure the minimum energy performance requirements to at least achieve cost-optimal levels]. This means that EPCs are imposed on buildings even though they rightly remain free from energy performance requirements. *Article 12* (now *Art 17*) enabled the Member States to exempt officially protected buildings. This will force the owner of a historic house to pay for an EPC when there is no energy performance obligation (doubtless expensive, if it is a large mansion).

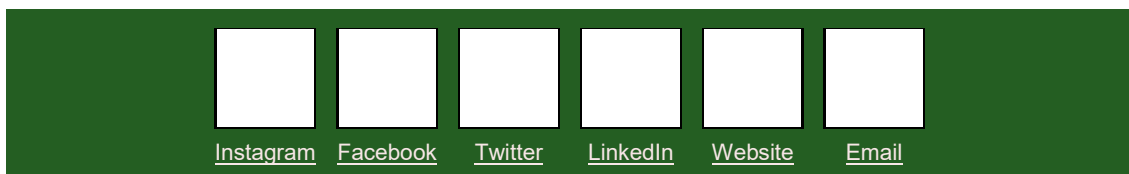
4. Under the current Directive, Member States can exempt listed historic houses from both the energy performance requirements and the requirement to issue an EPC. In the draft Recast, both took a hit. This is a way of limiting the exemption only to the listed buildings that have historic or architectural merit since the exemptions were too broad. Listed buildings have been placed in a new paragraph with an important nuance (this means that Member States may not exclude anymore some categories of buildings from the application of this Article):

5. Inspection of heating, ventilation and air-conditioning systems (*Art 20*): **Systems shall be inspected at least every five years.** Every two years for systems with generators of an effective rated output of more than 290 kW. However, the alternative consisting of giving advice to users on the replacement of generators, etc. is still there.

6. **Technical building systems** (*Art 11*): the energy performance of installed, replaced, or upgraded technical building systems has to be assessed – either the altered part or the whole altered system (this means that the owner has to spend on a consultant).

7. **Data exchange** (*Art 14*): Member States shall ensure that owners, tenants, and managers can have access to their systems' data (interoperability of services and of data exchange).

8. **Financial incentives** (*Art 15*): Member States shall provide financing, support measures and all the instruments to stimulate the necessary investments in energy renovations. However, it does not apply enough regulatory pressure to make the Member States pay.



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